

ESTTA Tracking number: **ESTTA558477**

Filing date: **09/09/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	91195609
Applicant	Plaintiff Minnesota Twins, LLC
Other Party	Defendant Minnesota Wild Hockey Club, L.P.
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	No

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 10/17/2013. Minnesota Twins, LLC requests that such date be extended for 90 days, or until 01/15/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	01/15/2014
Deadline for Discovery Conference :	02/14/2014
Discovery Opens :	02/14/2014
Initial Disclosures Due :	03/16/2014
Expert Disclosure Due :	07/14/2014
Discovery Closes :	08/13/2014
Plaintiff's Pretrial Disclosures :	09/27/2014
Plaintiff's 30-day Trial Period Ends :	11/11/2014
Defendant's Pretrial Disclosures :	11/26/2014
Defendant's 30-day Trial Period Ends :	01/10/2015
Plaintiff's Rebuttal Disclosures :	01/25/2015
Plaintiff's 15-day Rebuttal Period Ends :	02/24/2015

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *Since the last suspension deadline, counsel for the parties have continued their substantive negotiations towards settlement. They have had multiple email exchanges, on July 15, August 22, August 24, September 5 and September 6. Also, they have had two lengthy telephone discussions addressing outstanding issues. In addition, each has conducted legal research to determine whether certain settlement proposals by the other are viable from their perspective. Furthermore, during this time period, counsel for Applicant engaged in conversations with its client relating to all of the same. As a result, the parties have made very substantial movement toward a resolution. As of today, as a result of the above efforts, the latest written settlement counterproposal was presented from counsel for Applicant to in-house counsel for Opponent. At this point, both parties believe that resolution on the remaining issues is now imminent and that the additional time is needed for such settlement to be memorialized in a draft agreement which, when finalized, should allow the parties to resolve this matter without the need to*

proceed with the Opposition.

Minnesota Twins, LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Minnesota Twins, LLC has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/Maryann E. Licciardi/

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